

NPDES
INSPECTION REPORT ADENDUM
DRINKING WATER TREATMENT FACILITY
OROFINO, IDAHO

June 20, 2011
Prepared by:
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Lewiston Regional Office
Idaho Department of Environmental Quality

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(Unless otherwise noted, all details in this inspection report were obtained from conversations Mr. Michael Martin, Water and Wastewater Supervisor)

I. Facility Information

Facility Name: City of Orofino, ID Drinking Water Treatment Plant (Facility)

Facility Type: Drinking Water Treatment Plant

Facility Location: 705 Main Street
Orofino, ID 83544

Mailing Address: P.O. Box 312
Orofino, ID 83544

Facility Contacts: Michael Martin, Water and Wastewater Supervisor

Facility Numbers: Ph: [\(208\) 476-5556](tel:(208)476-5556)
Fax: [\(208\) 476-3634](tel:(208)476-3634)

Permit Number: ID-000105-8

Permit Status: Permit became effective on November 1, 2006 and expires on October 31, 2011.

SIC Code: 4941

II. Inspection Information

Inspection Date/Time: June 20, 2011 8:54 AM to 11:45 AM

Inspector: Jerry W. Shaffer (Idaho Department of Environmental Quality, Lewiston Regional Office)

Weather: Sunny, clear and hot

Purpose: Determination of compliance with the NPDES Permit and the Clean Water Act.

III. Inspection Entry

This was an announced inspection. The operator of the Facility was contacted prior to the June 20th inspection date.

I arrived at the Water Treatment Plant at 8:54 AM and met with Michael Martin, Water and Wastewater Supervisor, who is the onsite operator.

I discussed the purpose of the visit with Mr. Martin prior to the inspection. I was not denied access to the Facility.

I was accompanied throughout the inspection by Mr. Martin.

IV. Inspection Chronology

On June 20, 2011, the inspection began with an entry interview, followed by a file review and a tour of the Facility. The Facility tour included an inspection of the treatment unit operations. As part of the file review, the Facility's quality assurance plan (QAP), the operations and maintenance (O&M) plan and discharge monitoring reports (DMRs) are reviewed. According to Mr. Martin, he is the certified operator responsible for overseeing sample collection, onsite analysis and filling out the DMRs.

The inspection then concluded with an exit interview where I pointed out the areas of concern I observed during the inspection.

V. Owner and Operator Information

The Facility is currently owned and operated by the City of Orofino, Idaho.

VI. Background

The permit authorizes the Facility to discharge to the Clearwater River through outfall 001. The Facility has a design flow of 0.10 million gallons per day (MGD) and an existing average daily flow of 0.03 MGD. The Facility services a population of approximately 2510.

The collection system is 100% separated sanitary sewer.

VII. Waste Management Process

The Facility consists of a single cell concrete settling basin with overflow to the Clearwater River.

At the time of the inspection, all treatment units were operational.

VIII. Facility Sample Collection and Analyses

The sample collection and analyses duties at the Facility are overseen by Mr. Martin who is the certified operator responsible for overseeing sample collection, onsite analysis, filling out and signing the DMRs prior to submitting them to EPA.

The parameters analyzed onsite using monitoring equipment include Total Suspended Solids, Total Residual Chlorine, pH, turbidity, alkalinity, and temperature.

Metals, total tri-halomethane (TTHM), and aluminum are analyzed by an outside laboratory (i.e. Anatek Labs, Inc. in Moscow, ID)

IX. Areas of Concern

The inspection included a review of the treatment system, the sample collection and analyses procedures, and documentation required by the Permit. During the course of this inspection, I observed and identified the following areas of concern:

- A. Quality Assurance Plant (QAP): Section II.A.3.a of the City's NPDES Permit reads, "At a minimum, the QAP must include the following: Details on the number of samples, type of sample containers, preservation of samples, holding times, analytical methods, analytical detection and quantitation limits for each target compound, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping method, and laboratory data delivery requirements." The City has only partially complied with the requirements and has not provided information analytical detection and quantitation limits for each target compound, precision and accuracy requirements and other required information.

Section II.A.3.b of the City's NPDES Permit reads, "At a minimum, the QAP must include the following: Map(s) including the location of each sampling point." The City's QAP does not contain this information.

Section II.A.3.c of the City's NPDES Permit reads, "At a minimum, the QAP must include the following: Qualification and training of personnel." The City's QAP does not contain this information.

Section II.A.3.c of the City's NPDES Permit reads, "At a minimum, the QAP must include the following: Name(s), address(es) and telephone number(s) of the laboratories, used by or proposed to be used by the permittee." The City's QAP does not contain this information.

- B. Best Management Plant (BMP): Section II.B.2 of the City's NPDES Permit reads, "The permittee must develop and implement a BMP Plan which achieves the objectives and the specific requirements listed below. The permittee must submit written notice to EPA that the Plan has been developed and implemented within 180 days of the effective date of the permit." The City has not developed a BMP Plan for this facility.

Section II.B.3 of the City's NPDES Permit reads, "A copy of the BMP Plan shall be maintained at the facility and be available to EPA or its authorized representatives, upon request." The City has not developed a BMP Plan for this facility.

- C. Signatory Requirements: Section V.E.1 of the City's NPDES Permit reads, "All permit applications must be signed as follows: For a municipality, state, federal, Indian tribe, or other public agency: by either a principal executive officer or ranking elected official." The reapplication for the new NPDES Permit was signed by Michael Martin, Water and Wastewater Supervisor.

Section V.E.2 of the City's NPDES Permit reads, "All reports required by the permit and other information required by EPA must be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- a) The authorization is made in writing by a person described above;
- b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as a position of a plant manager, operator of a well field, superintendent, position of equivalent responsibility, or an individual

- or position having overall responsibility for environmental matters for the company; and
- c) The written authorization is submitted to the Director of the Office of Compliance and Enforcement." The City was unable to provide the subject written authorization during the inspection.

X. Additional Observations

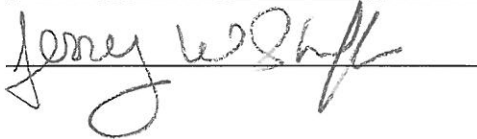
- A. Reporting Procedures: During the re-creation of the December 2009 DMR, the following discrepancies were discovered.
- The City incorrectly transferred metals laboratory data to the DMR in that the results in the DMR had a greater degree of precision than the laboratory results.
- The City used monthly average flows for determining Daily Outfall Flows and loading limits for Total Suspended Solids and Total Residual Chlorine.
- The City collected two samples for aluminum during the month but only reported the results for one sample.

XI. Inspection Sampling

Samples were not collected by the inspector at the time of the inspection.

Report Completion Date: _____

Lead Inspector Signature: _____

A handwritten signature in black ink, appearing to read "Jerry Wash", is written over a horizontal line.